

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE BOYD, et al.
*individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

LAW OFFICES OF SHAPIRO, BROWN, &
ALT, LLP, et al.,

Defendants.

Civil Action No. 3:12cv700

DECLARATION OF MICHAEL OTT

I, Michael Ott, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am not employed and receive disability from the United States government. Several years ago, I fell and broke my neck. I also have problems with disc deterioration in my back. It is best for my health that I do not travel long distances. Often, when I travel, it is in a wheelchair because of my health problems.

2. If this case were to be transferred to the Norfolk Division, it would cause significant hardships and inconveniences for me. The Norfolk Division is about two and a half hours away from my home, and this trip would cause me hardship because of my health issues.

3. The federal courthouse in Richmond is only about an hour away from my home. It would be much easier for me to travel to the courthouse in order to litigate my case.

4. I also have a son who attends high school in Stafford County. If I had to travel to the Norfolk Division in order to litigate this case, I would have to find someone in the area to watch him while I was traveling to and from Norfolk.

5. I also intend to call several witnesses located in the Richmond Division to support my case against the Defendants.

6. For example, I intend to offer the testimony of my wife, Tina Ott. My wife knows about the material facts relevant to my foreclosure, including our attempts to obtain a modification, the communications that we received from the Defendants, and the damages that we suffered when we ultimately lost our home. In fact, my wife was the person who handled most of the issues during our foreclosure. My wife works in Stafford, Virginia and it would be extremely difficult for her to take enough leave to travel to the Norfolk Division.

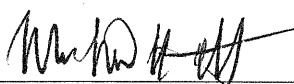


7. I also intend to seek the testimony of a Loan Processing Services representative to support my claims. LPS has an office in the Richmond Division of the Eastern District of Virginia at 5640 Cox Road, Glen Allen, Virginia 23060.

8. It is my preference that my case be litigated in the Richmond Division, as it is far more convenient for me.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: 1-26-2013



MICHAEL OTT